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7 MARTIN AUTO COLOR, INC.

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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 TANZANIE BERREMAN, an individual,
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14 Plaintiff,
15
16 vs.
17 MARTIN AUTO COLOR, INC., a California
Corporation,
18
19 Defendant.

Case No. 2:24-CV-02313-APG-NJK

**STIPULATION AND ORDER FOR
EXTENSION OF TIME IN WHICH TO
EXCHANGE INITIAL DISCLOSURES**

20 Defendant MARTIN AUTO COLOR, INC., by and through its attorneys of Lewis Brisbois
21 Bisgaard & Smith LLP, and Plaintiff Tanzanie Berreman (“Plaintiff”), by and through her counsel
22 of record, Greenberg Gross LLP, hereby stipulate that the time for the parties to share initial FRCP
23 26 disclosures will be extended to and including April 11, 2025. The current deadline is April 2,
2025.

24 This request is made on the grounds that Defendant’s counsel will be out of the office
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1 intermittently for medical reasons. This extension is requested in good faith and not for purposes of
2 delay.¹

3 Dated this 1st of April, 2025

Dated this 1st of April, 2025

4 GREENBERG GROSS LLP

LEWIS BRISBOIS BISGAARD & SMITH LLP

5 /s/ Michael A. Burnette

/s/ Ellen Jean Winograd

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Attorneys for Defendant

13 Las Vegas, Nevada 89135

14 *Attorneys for Plaintiff*

15 **ORDER**

16 IT IS SO ORDERED:

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UNITED STATES MAGISTRATE JUDGE

18 DATED: April 2, 2025

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27 ¹ Defendant's counsel ELLEN JEAN WINOGRAD, ESQ., will provide *in camera* physician
28 information to this Court, but does not believe the reasons are appropriately made a part of this
public record.